

Out Briefing

- Ideally, end inspection visit with a closing debriefing.
- Ask the inspector to review problems or instances he or she observed that may need to be corrected or may be potential violations. Review your list of deficiencies inspector noted during the visit.
- Obtain a receipt for all samples and copies of documents the inspector is taking and get information on how to obtain a copy of the final inspection report.

Post-inspection Activities

- Write a memo about the visit. Include:
 - inspector's credentials, name, and agency
 - date, duration, and type of inspection
 - record of the inspector's preliminary findings
 - copies of pertinent notes and photographs
 - list of documents or other information provided to the inspector
 - notes on any information gained from the inspector about new or pending regulations or enforcement actions.
- Within 30 days send the inspector a follow up letter stating any deficiencies noted and corrective actions taken; don't wait on possible enforcement action.
- Provide Group Commanders a list of noted deficiencies with OPRs and suspenses assigned.

- Notify the agency in writing of any improvements made since the inspection, especially if they have been made based on noted potential violations or recommendations made by the inspector.
- If a warning letter, notice of violation, or any other enforcement action is received, reply to the regulatory agency by the required response date, identifying the deficiencies already corrected or the proposed schedule for completing corrective measures.
- Copies of all correspondence should also be provided to the Base SJA, BEE, EPC, etc. as well as your MAJCOM and the appropriate Regional Compliance Office.

Air Force Center for Environmental Excellence Regional Environmental Offices

Eastern Region: HQ AFCEE/CCR-A
60 Forsyth Street SW, Suite 8M80
Atlanta, GA 30303-3416

Commercial : (404) 562-4205, or
Toll Free: (888) 610-7419

Central Region: HQ AFCEE/CCR-D
525 So. Griffin Street, Suite 505
Dallas, Texas 75202-5023

Commercial : (214) 767-4650, or
Toll Free: (888) 610-7418

Western Region: HQ AFCEE/CCR-S
333 Market Street, Suite 625
San Francisco, CA 94105-2196

Commercial : (415) 977-8881, or
Toll Free: (888) 324-9254

Managing Compliance Inspections

a pocket guide to
handling visits by
regulators



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Pre-Inspection Activities

- Designate individuals to interface with inspectors (people who have the best working knowledge of your programs and good people skills).
- Bring an outsider to look around before the inspection (anyone who is knowledgeable, observant and will say what he or she notices).
- Designate alternates for all people who interact with inspectors to ensure someone is available to handle unannounced visits.
- When there is prior notice, prepare by reviewing past inspection reports and Environmental Compliance Assessment & Management Program (ECAMP) reports.
- Develop a standard operating procedure for handling inspections.
- Contact the inspector and, if possible, determine the scope of the investigation or predict the areas the inspection will include.
- Prepare an environmental brochure on your base to showcase positive environmental programs.
- Notify base commanders and appropriate facility managers of pending inspection, if you were given advance notice.

Site Entry

- Find out and record the exact name the inspector has for your organization.
- Determine the purpose of the visit by asking what it's all about—this determines what you show the inspector. e.g.: permit, criminal investigation, particular complaint, overall inspection.

In Briefing

- If you can get the inspector to an in briefing, use it to give the inspector confidence about the base operation and management structure. The in briefing should cover:
 - inspection objectives
 - establishing the order of the inspection and schedule
 - identify documents the inspector will want to see
 - arranging for facility personnel to accompany the inspector(s) (ensure escorts have access to areas, line badges)
 - discussing whether sampling will be necessary
 - providing the inspector with general information about the facility (use the environmental brochure)
 - setting up an out brief.

Document Review

- Assemble in advance all documents the inspector needs to review.
- Keep all required records in easily accessible files. Have a written procedure for handling documents so any record can be quickly located. This should apply to:

• manifests	• waste analyses
• contingency plans	• storage records
• accumulation records	• land disposal restrictions
• training records	• compliance notifications
• service contracts	• waste process logs

Site Inspection

- Maintain a ratio of one installation representative to each inspector; avoid leaving an inspector alone.
- Have a radio or portable phone to maintain contact with the office to coordinate inspection schedule changes.
- Answer questions truthfully and explain processes openly, but do not guess at answers. Personnel should not speculate on questions not pertinent to their area of knowledge or responsibility.
- Ask inspectors what they are doing and why, and make notes on their answers.
- Take notes on all the questions, responses, and remarks made during the inspection. Compile a list and review what you have recorded with the inspector.
- Ask the inspector for regulation references for each noted violation. If you have legitimate concerns about the validity of a requirement, express the concern or disagreement during the inspection and/or outbrief, but do not argue or be confrontive in any way.
- In addition to taking split samples of any material the inspector samples, keep a log of and make duplicates of anything the inspector photographs. Plan ahead to have a camera and film ready for this purpose.
- Get the inspector's insights and observations and see the facility as he or she does.
- Maintain a cordial and professional relationship with the inspector. If an inspector is difficult or abrasive, nothing is gained by being hostile in return.